

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

GARRETT ROLFE

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Plaintiff,

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Civil Action File No.

v.

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1:22-cv-02339-MHC

\*

KEISHA LANCE BOTTOMS, in her  
Individual and Official Capacities  
as Mayor of the City of Atlanta, Georgia

\*

\*

\*

PAUL HOWARD, in his  
individual and official capacities,  
and ERIKA SHIELDS,

\*

\*

\*

in her Individual and  
Official Capacities

\*

\*

CLINT RUCKER, in his Individual  
and official capacities

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\*

DONALD HANNAH II, in his  
individual and Official Capacities,  
CITY OF ATLANTA, GEORGIA, and  
FULTON COUNTY, GEORGIA

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Defendants.

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**CONSENT MOTION FOR EXTENSION OF TIME**

COME NOW Plaintiff **Garrett Rolfe** and Defendant **Fulton County, Georgia** and file and serve this Consent Motion, in compliance with Local Rule 7.4 and Judge's Standing Orders, stipulating the time within which the Plaintiff shall have to respond to Defendant's Motion to Dismiss (Docket 25), filed on August 19, 2022, through and including September 30, 2022. Plaintiff previously consented to

extensions for Defendants City of Atlanta, Bottoms, Shields, and Rucker, which were granted by the Court. [Docs. 32 & 38]. Defendant Howard also filed a Motion for an Extension which was granted by the Court. [Doc. 35]. Defendants City of Atlanta's, Shields', Bottoms', and Howard's extensions expire September 9, 2022. Defendant Rucker's extension expires September 12, 2022.

In support of this request, Plaintiff believes an extension is necessary to effectively respond to all responsive pleadings presently filed in this case and related cases, and those the Plaintiff anticipates are forthcoming between now and September 12, 2022, due to the number and the complexity of the legal issues in question.

This 31st day of August, 2022.

**OFFICE OF THE FULTON COUNTY  
ATTORNEY**

/s/ Mathew Plott

(With expressed permission)

Mathew Plott

Georgia Bar No. 343501

Office of the Fulton County Attorney

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*Counsel for Defendant Fulton County*

**LORUSSO LAW FIRM, P.C.**

/s/Lance J. LoRusso

Lance J. LoRusso, Esq.

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*Attorney for Plaintiffs*

/s/ Ken Davis

Ken Davis  
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LoRusso Law Firm P.C.  
*Attorneys for Plaintiffs*

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FULTON COUNTY, GEORGIA

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Defendants.

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CERTIFICATE OF COMPLIANCE

I certify that the documents to which this certificate is attached have been  
prepared with one of the font and point selections approved by the Court in LR  
5.1B for documents prepared by computer.

/s/Lance J. LoRusso

Lance J. LoRusso, Esq.

Georgia Bar No. 458023

LoRusso Law Firm, P.C.

Attorney for Plaintiffs

/s/Ken Davis

Ken Davis, Esq.

Georgia Bar No. 705045

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*Attorneys for Plaintiffs*

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CERTIFICATE OF SERVICE

I certify that I electronically filed the within and foregoing with the Clerk of  
Court using the CM/ECF system.

This 31st day of August, 2022.

/s/Lance J. LoRusso

Lance J. LoRusso, Esq.

Georgia Bar No. 458023

LoRusso Law Firm, P.C.

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*Attorney for Plaintiffs*

/s/ Ken Davis

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